

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

**SCANNING TECHNOLOGIES
INNOVATIONS, LLC,**

Plaintiff,

vs.

THUNDER DATA SYSTEMS, INC.,

Defendant.

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Case No: 6:21-cv-00448-ADA

PATENT CASE

**PLAINTIFF’S ANSWERS AND DEFENSES TO
DEFENDANT’S COUNTERCLAIMS**

Now comes Plaintiff, Scanning Technologies Innovations, LLC (“Plaintiff,” “Counterclaim Defendant,” or “STI”), by and through undersigned counsel, pursuant to Federal Rules of Civil Procedure 12, without admission of the legal sufficiency thereof and responding only to the factual allegations therein, and states as follows for its Answer and Defenses to Defendant and Counter Plaintiff Thunder Data Systems, Inc.’s (“Defendant,” “Counterclaim Plaintiff,” or “Thunder Data”) Counterclaims [Doc. 10] (hereafter the “Counterclaims”) as follows:

PARTIES

1. STI has insufficient knowledge of the allegations contained in paragraph 1 and therefore denies same.
2. Admitted.

JURISDICTION

3. STI incorporates by reference each of its answers in paragraphs 1-2 above.
4. STI admits that jurisdiction is proper.

5. Admitted.

6. STI admits that venue is proper. STI denies any remaining allegations in paragraph

6.

COUNT I

7. STI incorporates by reference each of its answers in paragraphs 1-6 above.

8. STI admits that an actual controversy exists concerning infringement of the ‘101 Patent. STI denies any remaining allegations contained in paragraph 8.

9. Denied.

10. STI admits that Thunder Data seeks a declaratory judgment. STI denies any remaining allegations contained in paragraph 10.

COUNT II

11. STI incorporates by reference each of its answers in paragraphs 1-10 above.

12. STI admits that an actual controversy exists regarding validity of the ‘101 Patent. STI denies any remaining allegations contained in paragraph 12.

13. Denied.

14. STI admits that Thunder Data seeks a declaratory judgment. STI denies any remaining allegations contained in paragraph 14.

PRAYER FOR RELIEF

To the extent a response is required, STI denies that Thunder Data is entitled to any of the relief requested.

Dated: July 20, 2021.

Respectfully submitted,

/s/Jay Johnson

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2021, I electronically filed the above document(s) with the Clerk of Court using CM/ECF which will send electronic notification of such filing(s) to all registered counsel.

Respectfully submitted,

/s/Jay Johnson

JAY JOHNSON